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Invoice submitted to:
LaMonica Herbst & Maniscalco, LLP

November 1, 2023
File #79840117

Invoice # 12065

In Reference To: TransCare

Professional Services

		<u>Hours</u>	<u>Amount</u>
9/30/2020	BA	Review incoming brief on PPAS appeal	1.00 720.00
	AS	Reviewed trust documents and email to JC re: same (.1); emails with JWB re: appeal brief (.1)	0.20 99.00
	JWB	Reviewing prior briefs and key cases cited by defendants on issues potentially relevant to appeal; emails with AS; initial skim of appeal brief	4.50 2,531.25
	JC	Review second and third volume of judgment debtors production, BBVA and Wells Fargo bank statements, and C. Mercado chart providing context for transfers (4.3); draft email to Proskauer re: same (.5); review appeal brief (.7)	5.50 2,475.00
	CJH	Call with JC re: PPAS production and data re: same	0.40 153.00
10/1/2020	BA	Conferences with JC re: collection efforts, response to Proskauer positions	0.50 360.00
	AS	Instructions to AB re: appendix and cases cited (.5); reviewed appeal brief (.5); email to client re: appeal (.3); call with JC re: PPAS judgment discovery disputes (.4); began outlining appeal issues (.3)	2.00 990.00
	JWB	Further review of defendants' appeal brief	0.70 393.75
	JC	Research re: standard of review, requirements re: appeal brief and prepare same (2.4); email with Citi subpoena compliance unit (.2); review letters from Citi, Chase, BB&T re: subpoena (.3); preparation of subpoenas and restraining notices to parties alleged to owe agency fees to PPAS (.8); conference with LK re: service (.2); conference with AS re: collection (.5); email with A. Deming (Proskauer) re: production deficiencies (1.3)	5.70 2,565.00
	AB	Call with AS; reviewed index of exhibits of brief; compared exhibits with previously filed briefs	1.70 198.90

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10/1/2020	LK Prepared and scanned information subpoenas with restraining notices as per JC	0.60	70.20
10/2/2020	BA Conference with AS, JWB, AB re: appeal response process issues; reviewing appellant's brief, comparison vs post-trial submission	4.50	3,240.00
	AS Call with BA, JWB, and AB re: appeal brief (.4); call with JWB re: same (.9); prepared outline of brief (.6); call with BA and JC re: PPAS discovery dispute (.3); emails with AB re: appendix project (.2)	2.40	1,188.00
	JWB Conference call on strategy (.4); teleconference with AS re: initial tasks (.7); beginning research and review of cases cited by appellants (2.9); follow-up emails with AS and AB (.3)	4.30	2,418.75
	JC Email with AS re: inclusion of deposition transcripts in record on appeal; email, conference with RB re: same (.2); review record on appeal re: same (.4); draft subpoena to Anchin (accountant) and research re: nature of requests (2.2)	2.80	1,260.00
	RB Reviewed record on appeal and designations e-binder for deposition designations	0.30	40.50
	AB Zoom meeting with BA, AS, and JWB re: case update; compared cases from previous briefs; pulled all cases cited in brief	2.10	245.70
10/3/2020	JWB Beginning review of legal issues raised by appeal brief including review of key cases cited by appellants	2.40	1,350.00
10/4/2020	JWB Review of cases appellants cite with outlining, notetaking and additional research on questions raised	5.10	2,868.75
10/5/2020	BA Review outline, JWB emails, JC collection reports; teleconference with JC re: same	1.00	720.00
	AS Prepared appeal outline (.7); legal research re: standard of review (.4)	1.10	544.50
	JWB Complete initial review and notetaking on cases cited, together with related research on questions raised	6.20	3,487.50
	JC Review bank statements produced and email correspondence from Proskauer	0.50	225.00
10/6/2020	BA Review brief status with AS	0.80	576.00
	AS Call with JWB re: appeal brief (.7); discussed same with BA (.2)	0.90	445.50
	JWB Discussions with AS on tasks (1.2); initial follow-up and outlining (1.1)	2.30	1,293.75

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10/6/2020	JC	Email with A. Deming, M. Hackett re: closeout of Transcendence Transit, BB&T account and review bank statements re: same (.5); conduct research re: General Objection #12 re: transfers not subject to attachment/execution (2)	2.50	1,125.00
	LK	Prepared and scanned subpoena and restraining notice to Anchin as per JC	0.30	35.10
10/7/2020	BA	Conferences with JWB, AS; review materials re: appeal	1.80	1,296.00
	AS	Attention to brief	0.30	148.50
	JWB	Reworking standard of review section for appeal brief	3.60	2,025.00
	JC	Email with E. D'Avanzo (Snelling) re: information subpoena	0.20	90.00
10/8/2020	BA	Follow-up conference on appeal brief with JWB, AS	0.40	288.00
	AS	Reviewed JWB insert and email re: same (.1); call with JWB re: next steps (.2)	0.30	148.50
	JWB	Draft and circulate insert on timing of valuation for damages	4.20	2,362.50
	JC	Review HSBC correspondence re: subpoena (.2); research re: General Objection #12 re: transfers not subject to attachment and execution and draft motion to compel (2.6)	2.80	1,260.00
10/9/2020	JWB	Further research on going-concern valuation issues (1.5); email AS re: same (.2)	1.70	956.25
	JC	Email with N. Lieberman (Anchin) re: subpoena (.2); email with BA, AS re: A. Deming email re: production deficiencies (.3); research re: General Objection #12 re: MOMA system (3.6); attention to motion to compel (.5)	4.60	2,070.00
10/12/2020	AS	Attention to appeal outline (.4); discussion with JC re: various research projects (.5); attention to information subpoena recipient (.1)	1.00	495.00
	JWB	Teleconference with AS re: next steps and overall strategy (.6); drafting short insert for brief per AS discussion on going-concern issues (.8); reviewing prior notes on distinguishing appellants' cases to identify points not made in prior inserts drafted (1.5)	2.90	1,631.25
	JC	Email with R. Holtz (Latham) re: information subpoena to RM Acquisition (.3); email with A. Deming re: General Objection #12 re: MOMA system, further research re: same (1.8); draft motion to compel (3.6)	5.70	2,565.00
10/13/2020	BA	Emails, conference with JC re: snelling suit, collection status	0.20	144.00

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10/13/2020	AS	Calls with JWB re: appeal brief (1.5); prepared outline re: same (.5)	2.00	990.00
	JWB	Teleconferences with AS re: brief strategy and next tasks (1.5); reviewing/outlining bankruptcy court's statement of intent law versus framing of that law in appellants' brief (2.6)	4.10	2,306.25
	JC	Email with Anchin GC re: subpoena (.2); review response to Snelling information subpoena, update chart and email with BA, AS re: response (.4); attention to motion to compel (2.5)	3.10	1,395.00
	RB	Emails with AS re: joint PTO	0.10	13.50
10/14/2020	JWB	Drafting insert for appeal brief on bankruptcy court's statement of law on intent and appellants' failure to dispute it	3.30	1,856.25
	LK	Prepared and scanned subpoena and restraining notice as per JC	0.40	46.80
10/15/2020	AS	Email to JWB re: next steps	0.20	99.00
	JWB	Emails with AS following up on previous draft insert and discussing next steps	0.70	393.75
10/16/2020	AS	Prepared appeal brief	0.70	346.50
	JC	Conference with AS; conference with LK re: confirming closeout of Transcendence account was transferred to TransCare account (.5); review A. Deming email re: MOMA, attention to motion to compel (1.8)	2.30	1,035.00
	RB	Prepared joint pretrial order in Word version as per AS	0.40	54.00
	LK	Searched for matching entries according to Transcendence's BB&T account as per JC	0.80	93.60
10/18/2020	AS	Prepared appeal opposition brief	7.60	3,762.00
10/19/2020	AS	Prepared appellate brief	9.50	4,702.50
	JC	Research re: A. Deming defense as to third party discovery and email with Proskauer re: position re: judgment discovery; research re: avoidance of book transfers; teleconference with BBVA re: production	2.60	1,170.00
10/20/2020	BA	Conference with AS re: brief issues, form; review JWB comments (1.2); emails, conference with JC re: follow-up discovery (.6)	1.80	1,296.00
	AS	Prepared appellate brief (6.5); call with JWB re: projects re: same (.7); check in with BA re: same (.2)	7.40	3,663.00
	JWB	Teleconference with AS re: brief and open issues; researching re: relationship between solvency and badges of fraud	3.10	1,743.75

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10/20/2020	JC	Review pre-meet-and-confer email from A. Deming and research re: same (.8); pre-conference call with BA (.2); attend meet and confer with Proskauer (.7); attention to letter to Judge Bernstein requesting discovery conference and email with BA, AS re: same (2.8)	4.50	2,025.00
	RB	Reviewed Tilton testimony re: equity in Transcendence	1.60	216.00
10/21/2020	BA	Conference with AS re: draft status, issues, next steps	0.80	576.00
	AS	Prepared appeal brief	7.80	3,861.00
	JWB	Drafting insert for brief per discussion with AS	1.20	675.00
	JC	Attention to letter re: judgment discovery dispute and email with BA, AS re: same	1.30	585.00
	RB	Reviewed trial transcripts re: equity in Transcendence and ownership (1.5); emails with AS re: same (.2)	1.70	229.50
10/22/2020	BA	Review letter to Judge Bernstein; conference with AS, JC re: same (.7); conference with AS re: table of contents discussion of reply brief (re: PPAS brief vs response) (.3)	1.00	720.00
	AS	Prepared appellee brief	9.00	4,455.00
	JC	Incorporate comments to letter re: judgment discovery and email with BA, AS re: same	1.80	810.00
10/23/2020	BA	Review AS draft, notes re: same for follow-ups	2.00	1,440.00
	AS	Prepared appeal brief and legal research re: same	4.40	2,178.00
	RB	Circulated appeal brief (.1); reviewed J. Husson deposition transcript as per AS (.4)	0.50	67.50
10/24/2020	BA	Review brief, exhibits re: comments and revisions	3.00	2,160.00
	LBW	Review draft responsive appeal brief and comment	3.50	2,047.50
10/25/2020	BA	Conference with AS, LBW re: reviewing draft of appeal brief	2.00	1,440.00
	AS	Took comments from BA and LBW and revised appeal brief	1.30	643.50
	LBW	Review PPAS's appeal brief (1.4); re-review draft appeal brief (1.7); teleconference with BA, AS to review comments on draft response brief (1.4)	4.50	2,632.50
10/26/2020	BA	Review latest draft with revisions from yesterday (1.5); team conference re: appeal brief tasks/issues (.8); conference, emails with JC, AS re: motion to compel PPAS (.7)	3.00	2,160.00

			<u>Hours</u>	<u>Amount</u>
10/26/2020	AS	Revised appeal brief (2.5); comments to letter to Court re: PPAS discovery (.2); calls with paralegals re: next steps on appeal brief (.3)	3.00	1,485.00
	JC	Attention to letter re: discovery dispute as to MOMA system and email with BA and AS re: same; incorporate comments from same (1.8); review RM response to information subpoena (.3)	2.10	945.00
	RB	Calls and emails with paralegals and AS re: cites (.4); cite-checked draft brief (1.1)	1.50	202.50
	AB	Cite checking and filling in cites for brief (3.9); calls with AL re: cite checking (.2); call with RB, AS, and AL re: cite checking format (.1)	4.20	491.40
	LK	Attended call with AL, RB, and AB re: TransCare brief (.2); attended call with AL, RB, AB, and AS re: TransCare brief (.3)	0.50	58.50
	AL	Zoom meeting re: citations and format (.2); cite-filling, cite-checking, and reference checking for the brief (3.9)	4.10	479.70
10/27/2020	BA	Team meeting re: appeal brief (.5); conferences with JC, AS re: PPAS discovery dispute (.5)	1.00	720.00
	AS	Prepared appellee's brief (1); call with JWB re: comments to brief (1.7); call and email with RB re: paralegal projects (.2)	2.90	1,435.50
	JWB	Thorough review of latest draft of appeal brief and multiple teleconferences with AS re: comments	5.60	3,150.00
	JC	Attention to discovery dispute letter and incorporate comments to same	1.50	675.00
	RB	Emails with LK, AB, AL, and AS re: cite checking status (.2); reviewed and compiled brief comments (.5); call with AS re: brief (.2); reviewed trial transcript re: bill of sale (1.9); reviewed post-trial briefs re: Paratransit value and \$22M price (2)	4.80	648.00
	AB	Finished filling in cites for brief (.7); researched questions re: brief sent by AS (2.3)	3.00	351.00
10/28/2020	BA	Conferences with AS re: appeal brief, team meeting re: same	1.20	864.00
	AS	Prepared appellee brief	2.70	1,336.50
	RB	Calls with AS re: brief cites (2.2); prepared index of trial exhibits (.6); reviewed draft brief (2.3); prepared checklist for finalizing brief (.4); compared designations to appendix (.9)	6.40	864.00
	AB	Researched questions re: brief sent by AS (1.6); sent AS and RB overview of research (.2)	1.80	210.60

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10/29/2020	AS Prepared appellate brief	4.80	2,376.00
	RB Prepared checklists for brief finalization (.8); call with AS and AB re: same (.3); edited brief (4.1); call with AS re: same (.9); reviewed supplemental appendix draft (.1); emails with LK, AS and JC re: same (.2); researched Judge Kaplan's rules (.2)	6.60	891.00
	AB Call with AS re: brief projects (.1); call with RB and AS re: brief projects (.2); continued pulling Arnold cites and evidence re: his role as an expert (1.6); looked for and filled in empty cites (1)	2.90	339.30
	LK Prepared supplemental appendix	0.60	70.20
10/30/2020	BA Team meeting re: brief due 11/2	0.60	432.00
	AS Prepared appeal brief (1.6); call with paralegals re: citations and additional projects (.9)	2.50	1,237.50
	JC Review appendix and teleconference with LK re: same	0.30	135.00
	CJH Meet with RB, AB, LK, and AL re: plan for finalizing brief and correspondence re: same	0.40	153.00
	RB Created and circulated paralegal 10/30 agenda for finalizing brief (.4); meeting with CJH, AL, LK, and AB re: same (.2); reviewed and edited brief draft (2.4); call with AS, AB, LK and AL re: same (.8)	3.80	513.00
	AB Call with LK, RB, and AL re: cite checking (.2); edit and review appeal brief including cite checking, filling in cites and checking footnotes for duplication (5.8); call with RB, AL, LK and AS (.7)	6.70	783.90
	LK Prepared supplemental appendix (.5); formatted cites as per RB; call with RB, AB, AL and AS re: finalizing brief (.7); call with RB, AB, AL re: finalizing brief (.2); formatted cites and proofread brief (5.6)	7.00	819.00
	AL Teams call re: appellate brief (.5); cite-check and referenced-check appellee brief (4); standardize formatting (.9); call with AS, RB, LK, AB re: brief review and next steps (.7)	6.10	713.70
10/31/2020	AB Summarized all quotes from Arnold project (.5); finished cite checking brief and reviewing footnotes (.5)	1.00	117.00
	LK Updated Supplemental Appendix (.3); formatted cites and proof-read brief (.6)	0.90	105.30
	AL Added signature block to brief; checked and formatted new cites added by AS	1.30	152.10
11/1/2020	BA Review emails (brief inserts) with AS; review draft appeal response	2.00	1,440.00

		<u>Hours</u>	<u>Amount</u>
11/1/2020	AS	Revised appeal brief and prepared for filing	6.50 3,217.50
	CJH	Review and finalize brief	1.10 420.75
	AB	Call with AS re: finalizing brief (1.3); prepared brief for finalizing and filing including filling in cites, checking cites, proofreading, fixing formatting issues (2)	3.30 386.10
11/2/2020	BA	Team meeting, various emails, teleconferences re: last minute issue re: appeal brief	2.60 1,872.00
	AS	Finalized appeal brief and appendix for filing	6.30 3,118.50
	JC	Emails with AB, RB, LK, CJH, and AS re: appeal brief	0.60 270.00
	CJH	Review and finalize brief; calls with AS, AB, AL, and LK re: same	6.40 2,448.00
	AB	Prepared brief for finalizing and filing including filling in cites, checking cites, proofreading, fixing formatting issues and prepared cover page (4.7); call with CJH and LK re: formatting (.2); call with AS re: brief (.1); call with AS, CJH, LK re: brief (1.2); finalized and e-filed brief (1.2)	7.40 865.80
	LK	Finalized supplemental appendix (1); formatted, proofread, and cite-checked brief (3.8); call with AS, CJH, and AB re: brief (1.2); call with CJH and AB re: certificate of compliance (.2); prepared formatted and verified table of authorities (1.2); finalized brief and assisted with filing (1)	8.40 982.80
For professional services rendered			333.40 \$138,764.70
Balance due			\$138,764.70

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Avery Samet - Member	86.80	495.00	\$42,966.00
Bijan Amini - Member	31.20	720.00	\$22,464.00
Lita Beth Wright - Member	8.00	585.00	\$4,680.00
Casey Hail - Associate	8.30	382.50	\$3,174.75
Jeff Chubak - Associate	50.40	450.00	\$22,680.00
John W. Brewer - Of Counsel	55.90	562.50	\$31,443.75
Ryan Bathras - Paralegal	27.70	135.00	\$3,739.50
Abla Laallam - Paralegal	11.50	117.00	\$1,345.50
Anjanique Barber - Paralegal	34.10	117.00	\$3,989.70
Leah Khalil - Paralegal	19.50	117.00	\$2,281.50